

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ANN DORMANI, MITCHELL W.
KNOLL, DAVID RIGOL, and
DOROTHEA SIMMONS, on behalf of the
Target Corporation 401(k) Plan,
themselves, and a class consisting of
similarly situated participants of the Plan,

Plaintiffs,

v.

TARGET CORPORATION, SCOTT
KENNEDY, MICHAEL FIDDELKE,
PLAN INVESTMENT COMMITTEE,
JOHN MULLIGAN, COREY HAALAND,
JODEE KOZLAK, BETH JACOB, JOHN
DOE DEFENDANTS 1-10, and GREGG
STEINHAFEL,

Defendants.

Case No. 17-cv-04049-JNE-BRT

DEFENDANTS' MOTION TO DISMISS

Defendants hereby move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for dismissal with prejudice of the Class Action Complaint ("Complaint") in the above-described action.

The grounds for this motion are that the Complaint fails to plead plausible claims and fails to state a claim upon which relief may be granted.

This motion is based upon all of the files, records, and proceedings in this action, and upon Defendants' Memorandum In Support Of Their Motion To Dismiss and the Declaration of Wendy J. Wildung and its supporting exhibits submitted herewith.

Date: November 13, 2017.

/s/ Wendy J. Wildung

Wendy J. Wildung (#117055)

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